

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FOULDS, INC.,

Plaintiff,

Case No. 14 CV 7047 (CM)

v.

LIBERTY SURPLUS INSURANCE
CORPORATION,

Defendant.

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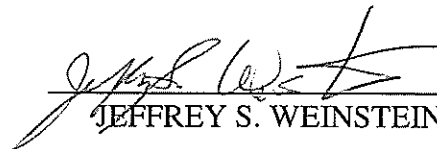
**DECLARATION OF JEFFREY S. WEINSTEIN IN SUPPORT OF
DEFENDANT'S MOTION IN LIMINE TO PRECLUDE PLAINTIFF
FROM INTRODUCING TESTIMONY OF ANTHONY SAGUTO
AND CHRISTOPHER BRADLEY AS EXPERTS**

JEFFREY S. WEINSTEIN, pursuant to 28 U.S.C. § 1746, declares that the following is true and correct under penalty of perjury:

1. I am a member of the law firm of Mound Cotton Wollan & Greengrass LLP, counsel for Defendant Liberty Surplus Insurance Corporation ("Liberty"). I am admitted to practice before this Court. This declaration is submitted in support of Defendant's motion *in limine* to preclude plaintiff from introducing testimony of Anthony Saguto and Christopher Bradley as experts.
2. Defendant's Exhibit 1 is a true and correct copy of Foulds, Inc.'s ("Foulds") Supplemental Rule 26 Disclosure.
3. Defendant's Exhibit 2 contains excerpts from a true and correct copy of the transcript from the May 22, 2015 deposition of Anthony Saguto.
4. Defendant's Exhibit 3 contains excerpts from a true and correct copy of the transcript from the April 7, 2015 deposition of Christopher Bradley.
5. Defendant's Exhibit 4 is a true and correct copy of Foulds' Proof of Final Claim.

6. Defendant's Exhibit 5 is a true and correct copy of Anthony Saguto's CV.
7. Defendant's Exhibit 6 is a true and correct copy of the expert report of Brian Gaspardo.

Dated: New York, New York
March 11, 2016

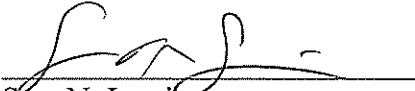


JEFFREY S. WEINSTEIN

CERTIFICATE OF SERVICE

I, Sara N. Lewis, certify that copies of the attached Declaration of Jeffrey S. Weinstein in Support of Defendant's Motion *in Limine* to Preclude the Expert Testimony of Anthony Saguto and Christopher Bradley were served on March 11, 2016 on counsel for the parties in this action by electronic means through the court's electronic filing system.

Dated: New York, New York
March 11, 2016


Sara N. Lewis